

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE  
DISTRICT OF PENNSYLVANIA, HARRISBURG DIVISION**

**IN RE:** :  
**NICHOLE L. VALLE** : **Case No 19-01589-HWV**  
                         **Debtors,** :  
                          :  
**LAKEVIEW LOAN SERVICING LLC** :  
                         **Movant** : **Chapter 13**  
                          :  
**Vs.** :  
**NICHOLE L. VALLE** :  
                          :  
                         **Respondents** :

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**ANSWER TO MOTION FOR RELIEF OF THE AUTOMATIC STAY**

**AND NOW**, comes Respondents, Nichole Valle, by and through his attorney, Gregory S. Hazlett, Esquire, and answers this Motion for Relief from Automatic Stay:

- 1. ADMITTED**
- 2. ADMITTED.**
- 3. ADMITTED**
- 4. ADMITTED:**
- 5. ADMITTED**
- 6. DENIED:** To the extent that counsel for debtor is unable to verify the level and extent if any, of the movant's averment it is specifically denied and strict proof of the same is demanded at the time of trial of this matter.
- 7. DENIED:** To the extent that counsel for debtor is unable to verify the veracity of the movant's averment it is specifically denied and strict proof of the same is demanded at the time of trial of this matter.
- 8. DENIED:** To the extent that counsel for debtor is unable to verify the veracity of the movant's averment it is specifically denied and strict proof of the same is demanded at the time of trial of this matter.

**9. DENIED:** Counsel for the debtor cannot concur with the award of fees and costs if the underlying motion is deemed to be unjustified.

**WHEREFORE**, the debtor respectfully requests that the Honorable Court deny the movant's Motion for Relief from the Automatic Stay for the aforementioned reasons. And deny movant's request for adequate protection.

**9/11/2019**

**Respectfully submitted,**

S/s Gregory S. Hazlett, Esq.  
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